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LA PUBLIC SERVICE
COMMISSION

September 16, 2015

Ms. Terri Lemoine Bordelon

VIA Hand Delivery

Records and Recording Division

Louisiana Public Service Commission

Galvez Building, 12th Floor

602 North Fifth Street

Baton Rouge, LA 70821

Re: Docket R-³³²⁵³~~33014~~ The United States Environmental Protection Agency's Proposed Rule on Carbon Dioxide Emissions from Existing Fossil-Fuel Fired Electric Generating Units Under Section 111(d) of the Clean Air Act.

Dear Ms. Bordelon:

I enclose the original and three copies of a Motion for Approval of Late Intervention and Request for Inclusion on Service List to be filed on behalf of America's Natural Gas Alliance (ANGA) in the above referenced proceeding.

Please file the original into the record and return a date stamped copy to me in the self-addressed stamped envelope enclosed.

Thank you for your attention to this matter

Sincerely,

Amy Farrell

Vice President, Market Development

By Hand

America's Natural Gas Alliance

710 8th St NW Ste 800

Washington, DC 20001

202-789-2642

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BEFORE THE

LOUISIANA PUBLIC SERVICE COMMISSION

LOUISIANA PUBLIC SERVICE COMMISSION

DOCKET NO. R-33253

IN RE: The United States Environmental Protection Agency's Proposed Rule on Carbon Dioxide Emissions From Existing Fossil-Fuel Fired Electric Generating Units Under Section 111(d) of the Clean Air Act.

America's Natural Gas Alliance's (ANGA) MOTION FOR APPROVAL OF LATE INTERVENTION
AND REQUEST FOR INCLUSION ON SERVICE LIST

America's Natural Gas Alliance (ANGA), pursuant to Rule 10 of the Louisiana Public Service Commission Rules of Practices and Procedures, submits this motion requesting authority for late intervention in the captioned proceeding as follows:

1.

ANGA is an educational and advocacy organization representing 17 of the largest independent natural gas exploration and production companies in the United States. These companies produce approximately one third of the U.S. natural gas supply. ANGA works with industry, government, and customer stakeholders to promote increased demand for and continued availability of our nation's abundant natural gas resource for a cleaner and more secure energy future.

2.

Notice of this proceeding was published in the LPSC's Official Bulletin No. 1065, dated June 20, 2014.

3.

ANGA submits this motion requesting authority for late intervention in order to have the opportunity to provide comments to the LPSC regarding issues surrounding natural gas supply, natural gas price curves, and the overall potential role of natural gas in the various approaches to compliance with EPA's Rule.

4.

ANGA's intervention will not prejudice any other party or delay the proceedings. Further, as a late intervenor, ANGA understands that it must accept the rulemaking as it finds it.

5.

ANGA and its member companies have an interest in, and may be affected by, this proceeding. ANGA and its member companies seek to expand the role of natural gas in meeting the resource needs of the electric utilities in Louisiana and the outcome of this proceeding may impact its opportunity to do so.

6.

Rule 10 of the LPSC's Rules of Practices and Procedure provides that any party with an actual interest may appear in a proceeding before the Commission. For the reasons set forth above, ANGA has a direct and substantial interest in the issues involved in this proceeding, which cannot be adequately represented by any other party.

7.

All communications and pleadings in this docket should be directed to

Amy Farrell

Vice President, Market Development

America's Natural Gas Alliance

710 8th St NW Ste 800

Washington, DC 20001

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